

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

KAREN COCHENOUR, individually and on)	
behalf of others similarly situated,)	
)	
Plaintiff,)	
)	Civil Action No. 1:25-CV-00007-RP
v.)	
)	
360TRAINING.COM, INC., D/B/A)	
MORTGAGE EDUCATORS AND)	
COMPLIANCE, INC.,)	
)	
Defendant.)	

**JOINT MOTION TO EXTEND DEADLINE FOR DEFENDANT TO RESPOND TO
COMPLAINT AND SET BRIEFING SCHEDULE**

Plaintiff Karen Cochenour (“Plaintiff”) and Defendant 360training.com, Inc. d/b/a Mortgage Educators and Compliance (“Mortgage Educators”) (collectively, the “Parties”) respectfully move this Court to extend the time for Mortgage Educators to respond to the Complaint by 7 days, up to and including March 5, 2025, and to enter a modified briefing schedule on Mortgage Educators’ forthcoming motion to dismiss. In support of this joint motion, the Parties state:

1. On January 2, 2025, Plaintiff filed her Complaint [Dkt. 1].
2. Plaintiff served Mortgage Educators on January 6, 2025, making its responsive pleading deadline January 27, 2025.
3. On January 27, 2025, this Court granted Mortgage Educators’ unopposed motion for extension of time to respond to the complaint, making its responsive pleading deadline February 26, 2025.

4. Mortgage Educators continues to investigate the claims and respectfully requests an additional 7 days, up to and including March 5, 2025, to prepare and file its forthcoming motion to dismiss.

5. Subject to Court approval, the Parties have agreed on a modified briefing schedule to accommodate pre-existing deadlines and commitments in other cases:

- a. Plaintiff's Response is due April 9, 2025.
- b. Mortgage Educators' reply is due April 23, 2025.

WHEREFORE, Plaintiff Karen Cochenour and Defendant 360training.com, Inc. respectfully request that this Court extend the deadline for Mortgage Educators to file its forthcoming motion to dismiss by 7 days, up to and including March 5, 2025, and to enter the modified briefing schedule above.

CERTIFICATE OF CONFERENCE

Counsel for Mortgage Educators conferred with counsel for Plaintiff, and the Parties jointly submit this request for relief.

Dated: February 26, 2025

Respectfully submitted,

HEDIN LLP

BAKER & HOSTETLER LLP

By: /s/ Elliot O. Jackson (with consent)

By: /s/ Rachel Palmer Hooper

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Counsel for Plaintiff and Putative Class

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this date, February 26, 2025, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Rachel Palmer Hooper